

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Information related to the following Google accounts and associated email addresses:  
Account ID: 413156676575 (Greengardens211@gmail.com), Account ID: 898790022528  
(abduabdullahgilani888@gmail.com), and  
Account ID: 551919651702 (bnb5933@gmail.com) that are stored at premises owned,  
maintained, controlled, or operated by Google LLC, a company headquartered at 1600  
Amphitheatre Parkway, Mountain View, CA 94043.

Case No. **22-M-382 (SCD)****WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS**

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure  
of the following person or property located in the \_\_\_\_\_ District of \_\_\_\_\_

(identify the person or describe the property to be searched and give its location):

See Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property  
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B.

**YOU ARE COMMANDED** to execute this warrant on or before 4-21-22 (not to exceed 14 days)

☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the  
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the  
property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory  
as required by law and promptly return this warrant and inventory to Hon. Stephen C. Dries  
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.  
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose  
property, will be searched or seized (check the appropriate box)

☐ for \_\_\_\_\_ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of \_\_\_\_\_

Date and time issued: 4-7-22 2:30 pm

*Stephen C. Dries*  
Judge's signature

City and state: Milwaukee, WI

Hon. Stephen C. Dries, U.S. Magistrate Judge  
Printed name and title

<b>Return</b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
<b>Certification</b>		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

## **ATTACHMENT A**

### **Property to Be Searched**

This warrant applies to information related to the following Google Accounts and associated email addresses that are stored at premises owned, maintained, controlled, or operated by Google LLC, a company headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043.

1. Google Account ID: **413156676575** ([Greengardens211@gmail.com](mailto:Greengardens211@gmail.com))
2. Google Account ID: **898790022528** ([abduabdullahgilani888@gmail.com](mailto:abduabdullahgilani888@gmail.com))
3. Google Account ID: **551919651702** ([bnb5933@gmail.com](mailto:bnb5933@gmail.com))

**ATTACHMENT B**  
**Particular Things to Be Seized**

**I. Information to be disclosed by Google LLC (the "Provider")**

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, regardless of whether such information is located within or outside of the United States, and including any information that has been deleted but is still available to the provider or has been preserved pursuant to a request made under 18 U.S.C. § 2703(D), the Provider is required to disclose the following information to the government for each account or identifier listed in Attachment A for the time period **January 1, 2015 to present**:

**Google Account**

- **SUBSCRIBER AND ACCESS RECORDS:** All business records and subscriber information, in any form kept, pertaining to the account, including: full name; physical address; telephone numbers, including SMS recovery and alternate sign-in numbers; alternative and recovery email addresses, including those provided during registration; usernames, screennames and other identifiers; account status; account creation date; account registration IP address; length of service; records of session times and durations, including log-in IP addresses; methods of connecting; log files; subscriber change history; means and source of payment (including any credit or bank account number); and detailed billing records;
- **DEVICES:** All device information associated with the accounts, including but not limited to, manufacture names, model numbers, serial number, media access control (MAC) addresses, international mobile equipment identifier · (IMEI) numbers, FCC ID numbers, Android IDs, and telephone numbers;
- **SERVICES:** All records and other information (including records of non-content user activity for each connection made to or from the Account(s), the date, time, length, and method of connection, data transfer volume, user names, source and destination IP address, name of accessed Google service, and all activity logs) associated with the Accounts, including those related to the use of all Google services, including but not limited to the following Google services: Calendar, Chrome Sync, Contacts, Docs, Drive, Gmail, Hangouts, Keep, Location History, Maps, Photos, Play Store, Search History, Tasks, Voice, and YouTube;
- **FORWARDING OR FETCHING ACCOUNTS:** All forwarding or fetching accounts relating to the accounts;

• **BROWSING, SEARCH, and APPLICATION USE HISTORY:** All Internet search, browsing history, and application usage history, such as Web & App Activity, from **January 1, 2015 to present**, including: search terms; browsing history, including application usage; bookmarks; passwords; autofill information; alerts, subscriptions, and other automated searches, including associated notifications and creation dates; all text typed into the Google Chrome address bar or Google search bar, including URLs and IP addresses; all URLs or IP addresses clicked on; user settings; and all associated logs and change history;

**PAYMENT:** All payment and transaction data associated with the account, such as Google Pay and Google Wallet, including: records of purchases, money transfers, and all other transactions; stored credit; gift and loyalty cards; associated payment cards, including any credit card or bank account number, PIN, associated bank, and other numbers; and all associated access and transaction logs, including IP address, time stamp, and change history;

**LINKED ACCOUNTS:** For all Google Accounts that are linked to any of the accounts listed in Attachment A by cookies; recovery, secondary, forwarding; or alternate email address; Android ID; IMEI; or telephone number, including SMS recovery number or sign-in account number, provide:

- a. Names (including subscriber names, user names, and screen names);
- b. Addresses (including mailing addresses, service addresses, residential addresses, business addresses, and e-mail addresses);
- c. Local and long distance telephone connection records (including records of text messages sent and received) from **January 1, 2015 to present**, if applicable;
- d. Records of session times and durations from **January 1, 2015 to present**, if applicable;
- e. Length of service (including start date) and types of service utilized;
- f. Telephone or instrument numbers (including model type/numbers, phone numbers, IMSIs, IMEIs, MEIDs, UDIDs, MAC addresses, and advertising IDs);

- g. Other subscriber numbers or identities, including any temporarily assigned network addresses (including the registration and session Internet Protocol ("IP") addresses with associated port numbers); and
- h. Means and source of payment for such service (including any credit card or bank account number).

- **LOCATION HISTORY:** All records indicating the location at which the account was active, such as Location History and Web & App Activity, including: GPS data; cell site/cell tower information; IP addresses; information associated with each location record, including the source of the data, date and time, latitude and longitude, estimated accuracy, device and platform, and inferences drawn from sensor data (such as whether a user was at rest, walking, biking, or in a car); and associated logs and user settings, including Timeline access logs and change history;

## **Gmail**

- **GMAIL:** The contents of all emails associated with the account; including, but not limited to: stored or preserved copies of emails sent to and from the account, draft emails, and deleted emails; attachments; the source and destination addresses associated with each email; the date and time at which each email was sent; the size and length of each email and true and accurate header information including the actual IP addresses of the sender and recipients of the emails;

- **CONTACTS:** Any records pertaining to the user's contacts, including: address books; contact lists, including autocomplete suggestions; social network links; groups, including Google Groups to which the user belongs or communicates with; user settings; and all associated logs and change history;

- **CALENDAR:** Any records pertaining to the user's calendar, including: Google Calendar entries; Google Tasks; reminders; appointments; invites; and goals; the sender and recipients of any event invitation, reminder, appointment, or task; user settings; and all associated logs and change history;

- **WEB-BASED CHATS:** The contents of all chats associated with the account, including Google Hangouts, Meet, and Chat, in any format (text, audio, or video) including, but not limited to: stored, deleted, and draft chat communications, including attachments and links; the source and destination addresses associated with each communication, including IP addresses; the size and length of each communication; user settings; and all associated logs, including access logs and change history;

## **Google Drive**

- The contents of all records associated with the account in Google Drive (including Docs, Sheets, Forms, and Slides) and Google Keep, including: files, folders, media, notes, lists, and other data uploaded, created, stored, or shared with the account including drafts and deleted records; the creation and change history of each record; accounts with access to or which previously accessed each record; any location, device, other Google service (such as Google = Classroom or Google Group), or third -party application associated with each record; and all associated logs, including access logs and IP addresses, of each record;

### **Google Photos**

- The contents of all media associated with the account in Google Photos or Picasa, including: photos, GIFs, videos, animations, collages, icons, or other data uploaded, created, stored, or shared with the account, including drafts and deleted records; third-party data; the creation and change history of each record; accounts with access to or which previously accessed each record; any location, device, or third-party application data associated with each record; and all associated logs, including access logs and IP addresses, of each record;

### **Google Maps and Trips**

- All maps data associated with the account, including Google Maps and Google Trips, including: all saved, starred, and privately labeled locations; search history; routes begun; routes completed; mode of transit used for directions; information associated with locations and other data associated with My Maps and Location Sharing; accounts and identifiers receiving or sending Location Sharing information to the account; changes and edits to public places; and all associated logs, including IP addresses, location data, and timestamps, and change history;
- Google Play Store

- **MEDIA AND APPLICATIONS:** All activity relating to Google Play, including: downloaded, installed, purchased, used, and deleted applications, movies, music, television shows, books, magazines, games, and other files; details of the associated device and Android ID for each application, medium, or file; user settings; and all associated logs, including IP addresses, location data, timestamps, and change history;

### **Google Voice**

- **GOOGLE VOICE:** All Google Voice records associated with the account, including: associated telephone numbers, including forwarding numbers; connection records; call detail records; SMS and MMS messages, including draft and deleted messages; voicemails, including deleted voicemails; user settings; and all associated logs, including access logs, IP addresses, location data, timestamps, and change history;



- **GOOGLE VOICE SUBSCRIBER RECORDS:** All business and subscriber records associated with the account on Google Voice, including: name; user name; physical address; alternate or recovery emails; telephone numbers, including SMS recovery numbers; linked accounts; account status; account creation date; account registration IP address; length of service; associated devices; associated Android IDs; means and source of payment (including any credit or bank account number); and all associated logs and change history;

## **Messaging Services**

- **MOBILE MESSAGING:** The contents of all messages associated with the account, including Google Duo, Android Messages, and Google Allo, in any format (e.g. SMS, MMS, or RCS) including, but not limited to: stored, deleted, and draft messages, including attachments and links; the source and destination addresses associated with each communication, including IP addresses and telephone numbers; the size and length of each communication; associated telephone numbers, including SMS recovery numbers; usernames and other identifiers; user settings; and all associated logs and change history;

## **YouTube**

- **YOUTUBE CONTENTS:** The contents of all media associated with the account on YouTube, whether active, deleted, or in draft, including: copies of videos and other media only if uploaded to, saved to, shared by or shared with the account; edits, comments, likes, chats, and other interactions, including associated URLs; search history; channels; subscriptions; subscribers, friends, and other contacts; playlists; connected applications; associated URLs for each record; creation and change history; privacy settings for each record; and all associated logs, including IP addresses, locations, timestamps, and device identifiers;

- **YOUTUBE WATCH HISTORY:** A record of the account's watch history, including: accessed URLs and their associated duration, privacy settings, upload timestamps, tags, IP addresses, change history, location information, and uploading account or identifier; the logs for each access by the account, including IP address, location, timestamp, and device identifier; and change history;

- **YOUTUBE SUBSCRIBER RECORDS:** All business and subscriber records associated with the account on YouTube, including birthday; name; username and other identifiers; linked accounts; alternate or recovery emails; telephone numbers, including 8M8 recovery numbers; physical addresses; account status; account creation date; account registration IP address; length of service; means and source of payment



(including any credit or bank account number); associated devices; associated Android IDs; and associated logs and change history;

- languages of input and output; and all associated logs, including access logs, IP addresses, timestamps, location data, and change history;

The Provider is hereby ordered to disclose the above information to the Government within **14** days of the issuance of this warrant.

**I. Information to be seized by the government**

All information described above in Section I that constitutes evidence and/or instrumentalities of violations of 18 U.S.C. §§ 2339A and 2339B involving the subscriber since **January 15, 2015**, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

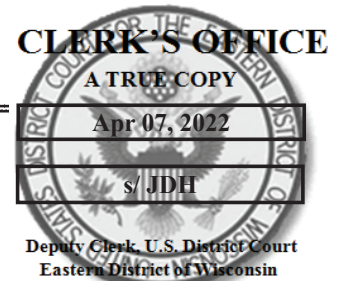
- a. Records and information of the subscriber's role in providing financial, material, training or personnel support to a designated Foreign Terrorist Organization (FTO).
- b. Records and information regarding the subscriber's ties to individuals arrested in Kosovo for terrorism;
- c. Records and information relating to targets or potential targets of violence, by the subscriber;
- d. The identity of the person(s) who created or used the Google ID;
- e. Evidence indicating how and when the account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and the account subscriber;

f. Any records pertaining to the means and source of payment for services (including any credit card or bank account number or digital money transfer account information);

g. Evidence indicating the subscriber's state of mind as it relates to the crime under investigation, including interests and motivations; and

h. Evidence that may identify any co-conspirators or aiders and abettors, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, and other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.



## UNITED STATES DISTRICT COURT

for the  
Eastern District of Wisconsin

## In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)Information related to the following Google accounts and associated email addresses: Account ID:  
413156676575 (Greengardens211@gmail.com), Account ID: 898790022528  
(abduabdullahgiani888@gmail.com), andAccount ID: 551919651702 (bnb5933@gmail.com) that are stored at premises owned, maintained, controlled, or  
operated by Google LLC, a company headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043.Case No. **22-M-382 (SCD)**

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A.

located in the \_\_\_\_\_ District of \_\_\_\_\_, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section*  
18 U.S.C. § 2339A;  
18 U.S.C. § 2339B

*Offense Description*  
Providing material support to terrorists; providing material support or resources to  
designated foreign terrorist organizations.

The application is based on these facts:

See attached Affidavit.

- ☐ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (*give exact ending date if more than 30 days*: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

Jessica Krueger, SA FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_ telephone \_\_\_\_\_ (*specify reliable electronic means*).

Date: 4-7-22 \_\_\_\_\_

City and state: Milwaukee, WI \_\_\_\_\_

Judge's signature

Hon. Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT

I, Jessica Krueger, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the FBI and have been since November 2009. I am involved in investigations of persons suspected of violations of Federal law in the State of Wisconsin and throughout the United States. I have gained experience conducting investigations through formal training and consultation with local, state, and federal law enforcement agencies as well as from law enforcement investigations themselves. I have assisted in multiple criminal investigations and participated in numerous search and arrest warrants related to such investigations.

2. The facts in this affidavit come from my personal observations, my training and experience, and from information obtained from other agents and witnesses. This affidavit is intended to show simply that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

3. Based on the facts as set forth in this affidavit, there is probable cause to believe that the information described in Attachment A contains evidence of violations of 18 U.S.C. §§ 2339A (providing material support to terrorists), and 2339B (providing material support or resources to designated FTOs) as described in Attachment B.

## JURISDICTION

4. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

## PROBABLE CAUSE

5. The FBI is investigating allegations of Bardh Behluli, a naturalized U.S. citizen residing in Milwaukee, Wisconsin, providing material and financial support to ISIS, a designated FTO, since at least December 2015.

6. By way of background, in August 2021, the FBI received information from the Kosovo Police that Bardh Behluli, a naturalized U.S. citizen residing in Milwaukee, Wisconsin, was observed in Kosovo in a vehicle with two individuals known to be associated with ISIS – Ergim Sylja and Ardijan Gjuraç. The Kosovo authorities further provided audio recordings they obtained, in August and September 2021, through Kosovar-legal-system-authorized surveillance, which detailed conversations between Behluli, Sylja and Gjuraç. These conversations, which are discussed in greater detail below, revealed Behluli’s support of ISIS, as well as his knowledge of Gjuraç and Sylja’s ties to ISIS and their attempts to purchase weapons in support of ISIS.

### **ISIS Designation as a FTO**

7. On or about October 15, 2004, the U.S. Secretary of State designated al Qaeda in Iraq (“AQI”), then known as Jam’at al Tawhid wa’al-Jihad, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act (the “INA”) and as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the INA and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (i.e., “ISIS” – which is how the FTO will be referenced herein), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

### **Behluli’s Historical Relationship with Gjuraj**

8. Based on information obtained during the FBI’s investigation into Behluli, the FBI has determined that Behluli has known Gjuraj since at least December 2015 and is aware of his connections to ISIS. According to information obtained via a Grand Jury subpoena, Behluli sent 100 Euros to Gjuraj in December 2015, while Behluli was in Kosovo and Gjuraj was in Turkey. The money was sent via

MoneyGram and showed Behluli's name, date of birth and Wisconsin driver's license number. The money was sent to "Ardijan Gjuraj."

9. In January 2016, the Kosovo Police interviewed Behluli and asked him about Gjuraj. Behluli lied to the police stating that he did not know Gjuraj's true name, despite having sent Gjuraj money – using Gjuraj's name - less than a month prior. Behluli claimed to have met an individual known only as Salih through Facebook and that the two men agreed to meet when Behluli was in Kosovo. In early December 2015, Behluli met with Salih on two occasions along with two other individuals – Valon and Azem. Behluli stated that both Azem and Salih planned to travel with a tourist group to Turkey. Behluli claimed to have spoken with Salih, via Facebook, two days prior to Salih's travel to Turkey. He then spoke with Azem after Azem had arrived in Turkey. Azem told Behluli that Salih had separated from the group and his location was unknown. Behluli claimed to have had no contact with Salih and did not know his current location. When showed a photograph of Gjuraj by the police, Behluli confirmed that this was Salih but that he did not know that his true name was Ardijan Gjuraj. As noted above, this was a lie. Behluli told the police he deleted Salih's contact information from his phone prior to the interview.

10. According to open source reporting, on December 11, 2015, Gjuraj traveled to Turkey under the auspices of being a tourist. Once in Turkey, he separated from that group and made his way to Syria where he joined an ISIS battalion made up of Albanian foreign fighters. In February 2016, Gjuraj attempted to leave Syria via Turkey and was arrested by Turkish authorities.



11. At the time of his arrest, Gjuraj was using a false identification document indicating he was a Russian citizen. Gjuraj was transferred back to Kosovo where he was sentenced to one year and five months for attempting to join ISIS. He served five months before his case was overturned by appeal<sup>1</sup>. The FBI believes that Behluli was aware of Gjuraj's intent to travel to Syria to join ISIS and lied to the Kosovo police to cover up his relationship with Gjuraj. According to open source reporting, the Kosovo Prosecutor attempted to call Behluli as a witness in Gjuraj's terrorism case on three occasions. However, Behluli did not report to court to testify.

12. According open source reporting, in November 2020, Kujtim Fejzulai killed four individuals and injured an additional fourteen in Vienna, Austria. Police shot and killed Fejzulai, who was a dual citizen of Austria and North Macedonia. ISIS claimed credit for the attack. The year prior, Fejzulai had been sentenced to twenty-two months in jail for having attempted to travel to Syria to join ISIS. He served seven months before being released.

13. According to information the FBI obtained via a 2703(d) order, an account utilized by Gjuraj was in contact at least 89 times via direct message with Fejzulai, including three days before the attack occurred.

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<sup>1</sup> According to open source information, in 2018, Gjuraj's case was overturned by the Kosovo Court of Appeals, which found that the court of first instance and the prosecution had no direct evidence, but only circumstantial evidence, which did not prove beyond a well-founded suspicion that the accused had crossed the border into Syria or joined a terrorist group.

**Recorded Statements by Behluli, Sylja and Gjuraj in August and September 2021**

14. According to information obtained from the U.S. Department of Homeland Security, Behluli departed for Kosovo on August 16, 2021 and returned to the United States on September 7, 2021. This matches information provided by the Kosovo authorities that Behluli was in Kosovo during the time he was observed meeting with Sylja and Gjuraj.

15. In September 2021, the Kosovo Police provided the FBI with audio recordings obtained during the course of their investigation into ISIS activities in Kosovo, specifically focused on Sylja, Gjuraj, Bellaqa, and Skenderi – as noted above, the four individuals arrested in October 2021. The recordings captured conversations between Behluli, Sylja, and Gjuraj on multiple occasions in late August 2021 and early September 2021. As detailed below, the conversations show that Behluli is aware of Sylja and Gjuraj's ties to ISIS and his support of ISIS ideology as well as Sylja and Gjuraj's efforts on their behalf.

16. Upon his return to the United States on September 7, 2021, Behluli was interviewed and his phone was examined by Custom and Border Protection at O'Hare International Airport in Chicago. A review of the phone examination by the FBI revealed a photograph of an Audi SUV with license plate number 03-811-HF, which was the vehicle into which the Kosovar Police installed audio recording equipment. According to information provided by the Kosovo police, the vehicle is registered to Sylja, further connecting Behluli with Sylja during his recent travels to Kosovo.

17. During a recorded conversation on August 24, 2021, Behluli comments on the appearance of Gjuraj saying that he looks 100 times better. Gjuraj comments that he was sick at that time from the war, likely a reference to his time in Syria with ISIS and/or his time in prison following his detention in Turkey (after attempting to cross into Turkey from Syria) and extradition to Kosovo. Later in the conversation, Gjuraj complains that he has no interest in women and does not even want to be intimate with his own wife. Syla comments that Gjuraj is good for war.

18. Later during the August 24, 2021 recording, the three men discuss communication with individuals over “there,” which the FBI assesses to be ISIS in Syria based on the Kosovar authorities’ post-arrest interview with Syla. Gjuraj states that “they” have asked for a report from the Bosnian guy, which the FBI assesses to be a reference to Skenderi based on a post-arrest interview with Syla as well as from information provided by the Kosovo Police that Skenderi’s nationality is Bosnian. The men continue to discuss the people over “there” and whether they are reliable. Gjuraj notes that if they are not reliable, referencing ISIS in Syria, they, meaning himself and Syla, would be in jail. Gjuraj notes that when things have become worrisome, “they” delete all their phone numbers and change them weekly.

19. During a recorded conversation on August 30, 2021, Behluli, Syla and Gjuraj discuss the August 2021 attack on the H-KIA airport in Kabul, Afghanistan by ISIS. Gjuraj notes that the situation at the airport became a crisis and the problem was that the Taliban achieved an agreement, likely referring to the agreement to allow for the evacuation. To which Behluli responded, referring to the Taliban, “they are neither

on that side, nor on this side,” presumably meaning ISIS. Gjuraj goes on to complain how the Taliban said it was okay for America and other countries to commit airstrikes in Afghanistan against threats. To which Behluli replies, “let Allah destroy them, the kafirs.” I know that “kafirs” is a term for non-believers, who are viewed by ISIS, al-Qaeda, and other Islamic extremist groups as the sworn enemies of Islam and Muslims.

20. During a recording from September 4, 2021, Behluli and Sylva are captured on the recordings discussing America and weapons. While discussing another individual and how this individual openly states that America is a terrorist, Behluli comments that there is no bigger terrorist than America. While talking about U.S. troops withdrawing from Afghanistan and other places, including Kosovo, Behluli states that now is a good time to get things, meaning weapons. Sylva responds that they can find as much as they want. Behluli then asks about anti-tank weapons. The men proceed to discuss the cost of RPGs and the effectiveness of expensive RPGs against tanks. As noted above, Sylva along with Gjuraj, Skenderi and Bellaqa were arrested in Kosovo for purchasing an RPG mere weeks later. The FBI believes that this conversation highlights Behluli’s awareness of the group’s plan to purchase an RPG as well as its ongoing interest in weapons purchases in support of ISIS.

## Kosovo Arrests of Syla and Gjuraj

21. On October 10, 2021, the Kosovo authorities arrested Gjuraj, Syla, Mentor Bellaqa, and Nehrudin Skenderi for planning terrorist attacks and the associated purchase of an RPG. During a search of Syla's residence, the police confiscated numerous items, including a hand grenade, three "bug-out" bags filled with survival items, a bag containing several radio communication equipment, an automatic rifle, and \$8,200 in United States currency. Also, during a search of Syla's property, the police discovered and confiscated two buried weapon caches, which included three automatic rifles, six hand grenades, a machine gun tripod, a machine gun barrel, ammunition belts, a hunting rifle, and numerous magazines and ammunition.

22. During a post-arrest interview, Syla stated that he has known Gjuraj since childhood, that Gjuraj has been to his home many times, and Syla had only been to Gjuraj's home on one occasion. During one of these visits to Syla's home, Gjuraj told Syla that he had weapons that he wished to hide at Syla's home. Syla agreed to hide these weapons, and they hid them first in Syla's yard then later in a plastic container buried in the mountains. He claimed the weapons hidden in the mountains on his property would be sold later for a profit. Gjuraj informed Syla that he had purchased these weapons in Rozhaj and in Albania.<sup>2</sup> Syla claimed to not know where Gjuraj acquired the money to purchase the weapons, but that he (Gjuraj) was involved in

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<sup>2</sup> I believe that Rozhaj a reference to a town in Montenegro.

drug and weapons deals. Sylja stated that he was aware of the plans to purchase an RPG, as was GjuraJ and Skenderi.

23. During the post-arrest interview, Sylja was asked if GjuraJ or others talked about committing an assault. Sylja stated that GjuraJ often used the expression “it would have been good to undertake an assault” and Sylja has responded that it is not a good time in the name of those “over there.” Sylja stated that those over there are his friends in Syria and that GjuraJ also has friends in Syria but Sylja does not know who they are. GjuraJ responded to Sylja’s comment that not in the name of those over there but in black and red.

24. Based on my knowledge and open source research, I believe that black and red is a reference to the Albanian flag and that the attack would be done under the auspice of nationalistic grievances as a cover for an attack in the name of ISIS. GjuraJ further stated that they had a joker to do things, presumably meaning an individual willing to conduct attacks or other acts on behalf of GjuraJ, Sylja and/or ISIS.

25. During the post-arrest interview, Sylja was asked if had spoken to Behluli about GjuraJ’s intentions. Sylja responded that GjuraJ used to always talk about weapons in Behluli’s presence but Sylja told Behluli that GjuraJ lies about prices and to not deal with him. When asked about the \$8,300 USD currency found in his home, Sylja stated that Behluli had provided him the U.S. currency.<sup>3</sup> Sylja claimed the money

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<sup>3</sup> According to information provided by the Kosovo Police, the list of items seized from Sylja’s residence during a search on October 10, 2021 listed the amount of US currency seized as \$8200. During the post-

was for repairs on his home and that he intended to repay Behluli. Sylja further provided in the interview that his mother's name is Sevdije Sylja and her maiden name is Rexhepi.

26. During the post-arrest interview, Sylja was further asked about military ("bug-out") bags that were found in his home. He claimed that they were brought to his home by GjuraJ and that they were for a camping trip with friends. Sylja further stated that there were water bottles, ropes, solar batteries to charge phones and radio connectors. Sylja also confirmed that the bags contained a glass-breaking chemical but claimed to not know its purpose. Sylja stated that the radio connectors were for the friends to communicate with each other in the valley. Based on my training and experience, I believe the radio connectors are what are commonly referred to in the United States as walkie talkies.

27. In late October 2021, GjuraJ requested to speak with the Kosovo Police while he was detained in a Kosovar prison. According to a report provided by the Kosovo Police to the FBI, during the informal interview, GjuraJ acknowledge that there were weapons, including a long rifle, an M84 automatic weapon, one or two Kalashnikovs and a CZ99 handgun as well as bullets and cartridges for these weapons. GjuraJ claimed that these weapons were purchased for buying and selling them. He claimed that the recently purchased RPG was done in cooperation with Skenderi, Sylja, Bellaqa and Shkodan Krasniqi. He claimed the weapon was purchased

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arrest interview of Sylja, the Kosovo Police report notes that the interview question noted the dollar amount as \$8300.



to sell it to an individual in Albania. When asked about a planned attack in Kosovo or abroad, Gjuraj stated that he spoke with Behluli and Syla and stated they needed to attack the Slavs<sup>4</sup> and that the attack needed to be carried out in the name of the red and black Albanian nationalism. He also identified two individuals he communicated with in Syria, who were members of ISIS.

### **Behluli's Financial Support to Arrested Individuals and their Associates in Kosovo**

28. In September 2021, the FBI received information from MoneyGram pursuant to a subpoena. The information showed that Behluli has sent a significant amount of money to individuals in Kosovo since 2015. Of note, between June 2018 and May 2021, Behluli sent approximately \$16,178 to Sevdije Syla with a residing address in Kline, Kosovo. As noted above, Syla provided to Kosovo police that Sevdije Syla is the name of his mother.

29. The FBI assesses that Behluli sent money to Syla via Syla's mother to avoid detection by law enforcement, and that Behluli was intentionally sending money to an individual associated with ISIS based on the recordings during which comments in support of ISIS were made as well as discussion about communications with what are believed to be ISIS in Syria. The investigation has not shown Behluli to have a family relationship with Syla or his mother.

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<sup>4</sup> Slavs are members of the ethnic and linguistic body of peoples in Europe, residing chiefly in eastern and southeastern Europe but extending also across northern Asia to the Pacific Ocean. Slavic languages belong to the Indo-European family. Customarily, Slavs are subdivided into East Slavs (chiefly Russians, Ukrainians, and Belarusians), West Slavs (chiefly Poles, Czechs, Slovaks, and Wends, or Sorbs), and South Slavs (chiefly Serbs, Croats, Bosnians, Slovenes, Macedonians, and Montenegrins).

30. In September 2021, the FBI received information from U.S. Bank pursuant to a subpoena. The records revealed that Behluli withdrew \$8,000 from his personal checking account on August 12, 2021, which is four days prior to his travel to Kosovo. As noted above, Sylja stated that Behluli provided him with \$8,300 dollars in cash, and based on information provided by the Kosovar police, \$8,200 in U.S. currency was confiscated from Sylja's residence during the October 10, 2021 arrest and search operation. Further, photographs taken of items seized during the search of Sylja's home show that the U.S. currency found in Sylja's home was in a U.S. Bank envelope.

31. In January 2022, three months after the arrests in Kosovo, the FBI received information from Western Union. On three occasions, Behluli sent money to a Granit Fazlija in the amounts of \$4,999, \$3,597.55 and \$1,807. Fazlija received the first money transfer in Slovenia and the second two transfers in Kline, Kosovo – the hometown of Sylja. The investigation has shown that Fazlija is an associate of both Sylja and Behluli.

32. According to information obtained from Snapchat in December 2021 pursuant to a 2703(d) order, Behluli, using account bn4more2, communicated with user granit.fa on multiple occasions in November and December 2021. Subscriber information for this account showed the account display name was Granit and was registered with email address granit\_fazlija@outlook.de.

33. A review of a media device seized from Sylja at the time of his arrest showed a Facebook contact with username granithfazlija. In addition, Sylja's Instagram account exchanged messages with Instagram username granit.fa. Based on

this information, it is likely Behluli continued to send money in support of ISIS through an associate of both his and Sylva's.

### **Behluli's Material Support to Arrested Individuals in Kosovo**

34. In late 2021, the FBI received information from Walmart, Ebay, and Amazon, pursuant to Grand Jury subpoenas, regarding purchases made by Behluli utilizing U.S. Bank credit and debit cards belonging to him. The debit and credit cards were linked to Behluli through information obtained from a Grand Jury subpoena to U.S. Bank. The FBI conducted a review of the purchases made by Behluli between November 2016 and December 2021 and determined that many of the purchases, as detailed more below, are consistent with items seized during the search of Sylva's residence. Further, based on my training and experiences, a large number of the purchases are consistent with a person who may be procuring items and materials for a group of people who were preparing, training or planning to engage in a prolonged military-style action. Several of these purchases, as detailed more below, were made in the days and weeks leading up to Behluli's travel to Kosovo.

35. According to information from the U.S. Department of Homeland Security, Behluli traveled from Chicago O'Hare International Airport (ORD) to Pristina, Kosovo (PRN) on January 20, 2018. Between January 10, 2018 and January 17, 2018, according to information provided by Amazon, Behluli purchased the below items, which are consistent with items seized during the search of Sylva's residence based on an evidence log and search photos provided by the Kosovar Police.

- a. 2 - BAOFENG BF-F8HP (UV-5R 3rd Gen) 8-Watt Dual Band Two-Way Radio (136-174MHz VHF & 400-520MHz UHF) Includes Full Kit with Large Battery
- b. 2 - BTECH QHM22 Platinum Series IP54 Rainproof Shoulder Speaker Mic for BaoFeng, BTECH, Kenwood Radios
- c. 2 - EBL BL-5L 3800mAh Li-ion Extended Battery Two-Way Radio Batteries for UV 5R UV-5R
- d. 2 - BTECH, BaoFeng BL-5 AA Battery Pack for BF-F8HP, UV-5X3, and UV-5R Radios
- e. 2 - BTECH USB Smart Charger (9-10.8V) Transformer Cable for BaoFeng, BTECH BF-F8HP, UV-82HP, UV-5R, UV-5X3 (CH-5, CH-8, etc. Charger Base Compatible)
- f. 1 - BTECH, BaoFeng BL-5 Battery Eliminator for BF-F8HP, UV-5X3, and UV-5R Radios
- g. 2 - Authentic Genuine Nagoya NA-771 15.6-Inch Whip VHF/UHF (144/430Mhz) Antenna SMA-Female for BTECH and BaoFeng Radio
- h. 3 - JTENG Rain Poncho, Waterproof Raincoat with Hoods for Concerts, Camping, Hiking, Cycling
- i. 3 - Olive Drab Green Warm Wool Fire Retardant Blanket, 66" x 90" (80% Wool)-US Military Style
- j. 1 - Aquatabs Water Purification Tablets 200 Pack
- k. 3 - North American Rescue Hyfin Vent Chest Seal, Original Version 2 Count (Pack of 1)
- l. 3 - RATS Rapid Application Tourniquet System Black
- m. 2 - Leeko Hydration Bladder, 2 Liter Water Reservoir for Hydration Pack Bladder Backpack, Leakproof Water Reservoir for Hiking, Bike Trip, Climbing, Hydro Backpack, Outdoor Event
- n. 3 - Tactical Pen Self Defense Tool for Survival Military Police Grade Badass EDC - Tactical Flashlight + Glass Breaker + Ballpoint Pen + Multi Tool - 2 Ink Cartridges, 3 Batteries

36. According to information from the U.S. Department of Homeland Security, Behluli traveled from ORD to PRN on August 17, 2018. According to information provided by Amazon, Behluli purchased the below items on August 7, 2018, which are consistent with items seized during the search of Sylva's residence based on an evidence log and search photos provided by the Kosovar Police.

- a. 3 - Headlamp, Super Bright LED Headlamps 18650 USB Rechargeable IPX4 Waterproof Flashlight with Zoomable Work Light, Hard Hat Light for Camping, Hiking, Outdoors
- b. 3 - Kictero Tourniquets Medical Swat First Aid Emergency Equipment, Tactical Army Life Saving Application, Gen 3 Combat Military Issue, Black, 2 Piece

37. According to information from the U.S. Department of Homeland Security, Behluli traveled from ORD to PRN on October 21, 2018. According to information provided by Amazon, Behluli purchased the below items on October 18, 2018, which are consistent with items seized during the search of Sylva's residence based on an evidence log and search photos provided by the Kosovar Police.

- a. 4 - Made in USSR Soviet Russian Army Standard sling With DEER Head Stamp RARE AK 47/74 AKS AKMS AKM RPK canvas Sling For Kalashnikov rifle and other mustard color by PetriStor

38. In addition to the items purchased in the days and weeks prior to travel, Behluli purchased items at other times that were consistent with items found during the search of Sylva's residence, including the below items:

- a. 2 - KA-BAR BKR7-BRK Combat Utility , Black, 7-Inch
- b. 1 - Headlamp, Super Bright LED Headlamps 18650 USB Rechargeable IPX4 Waterproof Flashlight with Zoomable Work Light, Hard Hat Light for Camping, Hiking, Outdoors
- c. 2 - HYBRIDLIGHT Journey - Solar/Rechargeable 160 Lumen LED Waterproof Flashlight. High/Low Beam, USB Cell Phone Charger, Built in Solar Panel Charges Indoors or Out, USB Cable Included for Quick Charge
- d. 1 - LEATHERMAN, Rev Pocket Size Multitool with Package Opener and Screwdrivers, Stainless Steel with Nylon Sheath
- e. 1 - Gerber Gear 22-01471N Suspension Needle Nose Pliers Multitool Multi-Plier with Nylon Sheath, Gray
- f. 2 - MECO Hand Cranking Solar Powered Rechargeable Flashlight Emergency LED Flashlight Carabiner Dynamo Quick Snap Clip Backpack Flashlight Torch Weather Ready, 8 Lumen - Green

- g. 1 - Solar Charger, Solar Power Bank 10000mAh External Backup Battery Pack Dual USB Solar Panel Charger with 2LED Light Carabiner Compass Portable for Emergency Outdoor Camping Travel-Orange
- h. 2 - Wildtek Source 21W Waterproof Portable Solar Charger Panel with Dual USB Ports

39. Further, a review of the search photographs taken at the time of the search of Sylva's residence show that many of the items noted above were stored in Hefty brand plastic bags with English labels, including "kamping," "headlights," "first aid," "phone chargers," and "rechargeable batteries." Based on a review of audio and media devices, Sylva regularly used Albanian to speak and communicate with Behluli. It is my belief that Behluli labeled these items to make them appear to be for the purpose of camping or other outdoor activities if question by law enforcement or border and custom officials.

40. In addition to the items noted above, a review of items purchased from Amazon, Walmart, and eBay, identified other items Behluli purchased that are consistent with a person who may be procuring items and materials for a group of people who were preparing, training or planning to engage in a prolonged military-style action. Among the purchases were toy/simulated firearms, concealable firearm holsters, additional tactical pens, tactical vests, additional rifle slings, additional tourniquets, wound dressings, suture kits, additional solar charging equipment, additional walkie-talkies, clothing – in multiple sizes, multiple tents, multiple backpacking grills, multiple military-tactical shemaghs, additional hydration bladders, multiple military molle belt tactical magazine dump drop reloader pouches,

multiple tactical flashlights, a 22-piece dissection kit, extreme cold barrier boots in multiple sizes, military arctic winter boot socks, anti-spy bug GPS camera RF signal detector and trenching tools such as multiple military folding shovels.

41. Of further note, in the days prior to traveling to Kosovo in August 2021, Behluli purchased a pocket knife, folding shovel, Walkie Talkie set, utility cord, a tactical flashlight, camping lanterns, camping backpacking tent, and two concealed carry holsters. According to information from the State of Wisconsin, Behluli is prohibited from owning a firearm due to a felony conviction in 2009.

42. In addition to items outlined above, Behluli also provided Sylva with a new iPhone during his recent travels to Kosovo in August and September 2021. Based on information the FBI received from Google pursuant to a search warrant of Behluli's email account, Behluli received an electronic receipt on August 15, 2021 from the Apple store in Wauwatosa, Wisconsin for the purchase of an iPhone 12 Pro Max with IMEI number 351330887413538 and serial number F2LG19A40D41. According to information obtained from the Kosovar Police, an iPhone 12 Pro Max was seized from Sylva at the time of his arrest. The IMEI and serial number match the phone purchased by Behluli just prior to his travel to Kosovo in August 2021, indicating additional items provided by Behluli to Sylva.

#### **Behluli's Internet and Email Activity**

43. Pursuant to a search warrant, in December 2021, the FBI obtained records from Google for Google account 572901101347 and its associated email address todaylist1@gmail.com (Account-1), which is used by Behluli. Included in the response



from Google was information regarding Behluli's internet activity while logged into his Google account, including web, image, maps, news, video and Youtube searches. A review of that information, which included records between October 2017, when the account was created, and December 2021, showed significant interest in weapons; tactical gear; ISIS members and leaders; ISIS propaganda; other terrorist groups including al-Qaida; and means to avoid law enforcement.

44. Between June 2018 and September 2021, Behluli, who as noted above is prohibited from owning a firearm due to a felony conviction in 2009, searched the internet and/or visited websites for the following items: German TT holster, gun prices Europe vs USA, Wisconsin Firearms Classifieds - Armslist, m76 scope, Wisconsin concealed carry, glock 19 for sale Wisconsin, gun shows today, AR 15 style rifle, CZ99 Yugoslavia 9mm pistol, gun broker, is it legal to shoot a gun on my property, lapua magnum sniper rifle, best concealed carry jacket, .308 winchester rifle, 30-06 Ruger American, 7.62x39 Ammo Bulk, Glock 19 price used, K98, Yugo Mauser, different style mounted machine guns, m63 mount, sg43 goryunov, tripod mounted 50 cal, Russian mounted machine gun, m37 gun, double handle machine gun, yugo 8mm mauser, m47 mauser, m44 mauser, RPD belt, m84 sniper, open carry get together, m64 rifle, SVD dragunov, 9mm zastava, and chain fed gun w(ith) ak ammo. Based on my training and experience, I know that many of these weapons searched by Behluli are military style machine guns. According to information provided by the Kosovar Police, many of these weapons searched for by Behluli were discovered during the arrest and search operations conducted in Kosovo in late 2021 and/or were

discussed by the individuals arrested, including a CZ99, M84, AK-47s and 7.62x39 ammo, which I know to be ammunition used for an AK-47 machine gun.

45. In addition to weapons, Behluli searched for and/or watched videos regarding night vision binoculars; glow on gun sight paint; live fire military drills; how to manipulate a AK-47; adjusting iron sights on an AK; how to zero an AK-47; Molotov cocktail how to; Molotov cocktail manual, how a Navy seal clears a room; and cutting the pie tactics, which I know to be a term used by military and police officers to describe entering a building and/or room. He also searched for information on how combat medical care including combat wound seal; how to suture a wound; pepper spray reaction; and what is a tourniquet used for.

46. Between October 2017 and August 2021, Behluli's internet search history showed significant interest in ISIS members and leaders as well as propaganda produced by the group. Behluli searched and/or visited websites for Lavdrim Muhaxheri, a now deceased ISIS commander in Syria and ISIS leader Abu Waheeb. He searched for ISIS members, including convicted Milwaukee based terrorist Waheba Issa Dais; deceased UK ISIS fighter Naweed Hussain; convicted UK ISIS supporter Anjem Choudary; Redouane Lakdim, who conducted an attack on behalf of ISIS in France; and Daniela Greene, a former FBI employee who married an ISIS member. Behluli also frequented news articles that reported on ISIS, ISIS attacks and ISIS members.

47. During the same date range, Behluli also searched leaders of other terrorism groups including Abu Mohammad al-Jolani, who has fought with al-Nusra,

ISIS and Ha'yat Tahrir al-Sham and Ibrahim al-Rubaish, an AQAP leader who was imprisoned at GITMO then later killed in a drone strike after escaping custody in Saudi Arabia. He also searched for and appeared to watch lectures by several radical Imams including Anwar al-Awlaki, an al-Qaida member who was killed in a 2011 U.S. drone strike in Yemen; Zekerija Qazimi, an Imam from Kosovo, who received a ten-year prison sentence in 2016 for recruiting for a terrorist group (ISIS) and inciting hatred; Sheikh Abdullah Faisal, who was extradited to the United States on terrorism charges; and convicted UK ISIS supporter Abu Baraa Abu Izzadeen.

48. Based on the records from Google, Behluli also searched extensively for information on a 2016 disrupted ISIS plot to attack an Israeli-Albanian soccer match, which resulted in the conviction of nine individuals in Kosovo for terrorism offenses. In addition to searching for news on these arrests, Behluli specifically searched for individuals arrested in the plot including Visar Ibishi, Leotrim Vojvoda, Burim Istrefi, and Leotrim Musliu. During the recorded conversations between Behluli, Gjuraj and Sylva in August and September 2021, Behluli was captured discussing the individuals named above and their ongoing prison sentences, indicating an ongoing interest and knowledge of the case and the individuals involved.

49. Based on the returns from Google, Behluli watched several ISIS propaganda videos. He also searched and/or visited websites for ISIS beheadings and the ISIS ambush video of four US soldiers killed in Niger. Behluli frequently searched and visited "jihadology," which is a well-known website devoted to archiving propaganda produced by significant terrorism groups, including ISIS.

50. Behluli's internet activity also showed an ongoing interest in concealing his activities from law enforcement. He specifically searched and/or visited websites for guns in motorcycle toys; toy motorcycle Glock smuggle; taping cuff key and razor to body; watching beheadings isn't illegal fuck you; watching beheadings isn't illegal right; what to do if asked to hand over your phone; real us passport; us passport template app; US Visa template; TSA full body scan; who owns TSA security; things TSA has confiscated; blanket w(ith) zipper; blanket w(ith) storage pouch; concealing blanke(t); audio surveillance bugs; audio bugs for cars; where do cops plan(t) audio bugs; money in security screening; how money looks in x-ray; money in gum wrap; stack cash tapee (taped) up; cash in black tape; cash wrapped in tape and socks; what is FISA; and using VPN to browse US websites. Behluli also regularly searched his name, names of his social media accounts, and variations of Gjuraj's name and Gjuraj's ongoing terrorism case in Kosovo. Following the October 2021 arrests in Kosovo, Behluli searched for news on the arrests, flight options to return to Kosovo and how quickly one can get a PCR covid test, including an interest in departing the United States.

51. Of note, according to information obtained from Walmart pursuant to a Grand Jury subpoena, two weeks prior to his travel to Kosovo in August 2021, Behluli purchased two rolls of Gorilla tape, which is black color. According to information obtained from Amazon, pursuant to a Grand Jury subpoena, Behluli also purchased black tape prior to his travels to Kosovo in January 2018, August 2018, and October 2018. As detailed above, Behluli searched for cash in black tape. It is my belief that

based on the timing of these purchases as well as Behluli's search history that Behluli takes great efforts to conceal money he carries overseas to avoid law enforcement scrutiny despite it not being illegal to carry money and/or send money overseas if properly reported to authorities.

52. According to information obtained from the Google search warrant for Account-1, on February 24, 2018, Behluli received an email to Account-1, which included an attached document. There was no content in the subject line or body of the email. The attached document was the Albanian translation of *The Compilation of Security and Intelligence Principles* authored by Abu Ammar Talut and al-Miqdad Ibn Amr. The 200 plus page document is a manual for effectively waging jihad by terrorist organizations. The manual includes guidance on computer and communication security, finances, propaganda, military and weapons training and methods to handle imprisonment. The email with the attachment was sent to Account-1 from abuabdullahgilani888@gmail.com. According to information obtained from Google pursuant to a 2703(d) order, this email account was registered under the name Abu Abdullah Gilani on February 24, 2021 – the same date the email was sent to Account-1. The registration IP resolved to Milwaukee and the date of birth listed on the subscriber information is XX/XX/1989, which is Behluli's date of birth.

### **Behluli's Use of Google**

53. According to information received from Google pursuant to 2703(d) orders and search warrant for Account-1, Behluli, between July 2013 and October

2021, has created at least eighteen Google accounts, including three accounts which are discussed in greater detail below.<sup>5</sup> There is probable cause to believe that the content of these email accounts and Behluli's internet activity while logged into these Google accounts, including web, image, maps, news, video and Youtube searches as well as other activity outlined in attachment B, contain evidence of his support to ISIS.

54. From my training and experience, I know that criminals utilize internet browsers, like Chrome, to conduct research relating to criminal acts and to find out what information is publicly available after the crime has occurred. As noted above, Behluli, using email Account-1, conducted numerous searches specific to weapons; tactical gear; ISIS members and leaders; ISIS propaganda; other terrorist groups including al-Qaida; and means to avoid law enforcement.

55. From my training and experience, I know that criminals also utilize numerous email addresses to hide criminal activity. Specially, criminals will open accounts for limited use, such as to email incriminating information or to sign up for new social media and communication accounts, but will not use the account extensively to avoid scrutiny or discovery by law enforcement. As noted above, an account likely opened by Behluli (abuabdullahgilani888@gmail.com) sent a military style manual for jihad to Account-1. It is my belief, based on my training and experience, that Behluli's use of multiple email addresses is to conceal his online

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<sup>5</sup> As noted in the application, a search warrant was already executed on Google account 572901101347 and associated email todaylist1@gmail.com.

activity, emails he has received/sent and social media and communication accounts to which he has registered.

56. I also know that criminals may delete information saved to their digital devices, such as iPhones and computers, to hide their criminal activities. However, that information may be saved by the service provider. For example, I know that Google can store a record of a customer's browser or map search history if the user is logged into their Google account. While a customer may clear their local search history that information may still be stored on Google servers. Due to Behluli's association with Gjuraj and Sylla, his knowledge and financial support of their criminal activities in support of ISIS and their recent arrests, I believe that Behluli's Google accounts may hold evidence relevant to the information described above.

57. As noted above, Behluli has created at least eighteen Google accounts over the past several years. These accounts are linked to him through various means, including telephone numbers, cookies, subscriber information, common subscriber names and shared devices. Outlined below are three accounts that have been used by Behluli and likely contain information relating to his support of ISIS.

**Account Registered under Behluli's Name and/or Date of Birth:**

- a. Google Account ID: **413156676575** ([Greengardens211@gmail.com](mailto:Greengardens211@gmail.com)) was created on October 14, 2021 – two days after the arrests in Kosovo. The account was registered under Bardh Behluli with a date of birth listed as XX/XX/1989. As noted above, this is Behluli's date of birth. A review of emails sent and/or received from this account included Western Union notifications on or about the dates which, according to information provided by Western Union pursuant to a Grand Jury subpoena, Behluli sent money to Granit Fazlija. According to information provided by Google, account **413156676575** utilizes the following Google services:



Gmail, Web & App Activity, Android, Location History, Google Calendar, and YouTube. The account is listed as enabled, indicating that it has not been deleted.

### **Accounts Registered with Behluli's Alias (Abdullah)**

58. According to information obtained pursuant to a search warrant of Account-1, Behluli has used the name Abdullah to communicate via email, indicating that he uses the name Abdullah as an alias. On April 2, 2018 and on April 6, 2018, Behluli sent emails from Account-1 to Office Deport requesting printing services. In both emails, Behluli signed the emails "Thank you Abdullah." In addition, Behluli received an email from Offer-Up – an online marketplace – in which he is referred to as "Abdullah." Based on my training and experience, I also know that the use of "ibn" is part of the naming convention in the Arab world and means "son of." The investigation has also shown, through DHS and State of Wisconsin records, that Behluli's father is Ahmet Behluli. Further, according to DHS records, Behluli was born in Gjilan, Kosovo and according to open source information, individuals from Gjilan are often referred to as Gilani.

- a. Google Account ID: **898790022528** (abduabdullahgilani888@gmail.com) was created on February 24, 2018 under the name Abu Abdullah Gilani. The account was registered using an IP address that resolves to Milwaukee, Wisconsin. The date of birth provided was XX/XX/1989, which is Behluli's date of birth. As noted above, this email address sent a military style manual for jihad to Account-1. According to information provided by Google, account **898790022528** utilizes the following Google services: Web & App Activity, Gmail, Google Hangouts, and YouTube. The account is listed as enabled, indicating that it has not been deleted.

- b. Google Account ID: **551919651702** (bnb5933@gmail.com) was created on January 14, 2016 under the name Abdullah Ussud. According to information obtained from the search warrant of Account-1, an email, received on October 7, 2017, from Amazon noted that the email address associated with the account was updated from bnb5933@gmail.com to todaylist1@gmail.com (Account-1). According to information obtained from Google pursuant to the 2703(d) order, the email address bnb5933@gmail.com received emails from Amazon. Further, according to information obtained from Amazon pursuant to a Grand Jury subpoena, while using an Amazon account registered to this email address, Behluli purchased a number of tactical and military items that were outlined above. According to information provided by Google, account **551919651702** utilizes the following Google services: Google Chrome Sync, Google Hangouts, YouTube, Android, Google Calendar, Gmail, Location History, and Web & App Activity. The account is listed as enabled, indicating that it has not been deleted.

59. Preservation requests under 18 U.S.C. § 2703(f) have been sent to Google regarding the Google accounts detailed above.

#### **BACKGROUND CONCERNING GOOGLE**<sup>6</sup>

60. Google is a United States company that offers to the public through its Google Accounts a variety of online services, including email, cloud storage, digital payments, and productivity applications, which can be accessed through a web browser or mobile applications. Google also offers to anyone, whether or not they have a Google Account, a free web browser called Google Chrome, a free search engine called Google Search, and other services. Many of these free services offer additional functionality if the user signs into their Google Account.

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<sup>6</sup> The information in this section is based on information published by Google on its public websites, including, but not limited to, the following webpages: the “Google legal policy and products” page available to registered law enforcement at [lers.google.com](https://lers.google.com); product pages on [support.google.com](https://support.google.com); and product pages on [about.google.com](https://about.google.com).

61. In addition, Google offers an operating system for mobile devices, including cellular phones, known as Android. Google also sells devices, including laptops, mobile phones, tablets, smart speakers, security cameras, and wireless routers. Users of Android and Google devices are prompted to connect their device to a Google Account when they first turn on the device, and a Google Account is required for certain functionalities on these devices.

62. Google advertises its services as “One Account. All of Google working for you.” Once logged into a Google Account, a user can connect to Google’s full suite of services offered to the general public. In addition, Google keeps certain records indicating ownership and usage of the Google Account across services.

63. Google LLC allows subscribers to obtain email accounts at the domain name gmail.com, like the email account listed in Attachment A. That gmail.com email address will be the log-in username for access to the Google Account.

64. Gmail can be accessed through a web browser or a mobile application. Additional email addresses (“recovery,” “secondary,” “forwarding,” or “alternate” email addresses) can be associated with the Google Account by the user. Subscribers obtain an account by registering with Google LLC. During the registration process, Google LLC asks subscribers to provide basic personal information, including the user’s full name, telephone number, birthday, and gender. If a user is paying for services, the user must also provide a physical address and means and source of payment. Therefore, the computers of Google LLC are likely to contain stored electronic communications (including retrieved and unretrieved email for Google LLC

subscribers) and information concerning subscribers and their use of Google LLC services, such as account access information, email transaction information, and account application information.

65. Google typically retains and can provide certain transactional information about the creation and use of each account on its system. Google captures the date on which the account was created, the length of service, log-in times and durations, the types of services utilized by the Google Account, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account (such as logging into the account via Google's website or using a mobile application), details about the devices used to access the account, and other log files that reflect usage of the account. In addition, Google keeps records of the Internet Protocol ("IP") addresses used to register the account and accept Google's terms of service, as well as the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the Google Account.

66. Google maintains the communications, files, and associated records for each service used by a Google Account on servers under its control. Even after a user deletes a communication or file from their Google Account, it may continue to be available on Google's servers for a certain period of time.

67. Google collects and retains data about the location at which Google Account services are accessed from any mobile device. This location data can derive

from a range of sources, including GPS data, Wi-Fi access points, cell-site locations, geolocation of IP addresses, sensor data, user searches, and Bluetooth beacons within range of the device. According to Google, this location data may be associated with the Google Account signed-in or registered to the device when Location Services are activated on the device and the user has enabled certain global settings for their Google Account, such as Location History or Web & App Activity tracking. The data retained may be both precision location data, like latitude and longitude coordinates derived from GPS, and inferential location data, such as the inference that a Google Account is in New York because it conducts a series of searches about places to eat in New York and directions from one New York location to another.

68. Google offers a free web browser service called Google Chrome, which facilitates access to the Internet. Chrome retains a record of a user's browsing history and allows users to save favorite sites as bookmarks for easy access. If a user is logged into their Google Account on Chrome and has the appropriate settings enabled, their browsing history, bookmarks, and other browser settings may be saved to their Google Account.

69. In my training and experience, evidence of who was using a Google account and from where, and evidence related to criminal activity of the kind described above, may be found in the files and records described above. As explained herein, information stored in connection with an email account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each

element or, alternatively, to exclude the innocent from further suspicion. In particular, the records and information associated with Google accounts and IP addresses that used Google's search engines (including google.com) to conduct Google searches may assist law enforcement officers.

70. Based on my training and experience, it is common for individuals who engage in criminal activities to conduct Internet searches—in particular, Google searches—in support of their operations.

71. Based on my training and experience, individuals involved in the Subject Offenses use methods to obfuscate their activity. The account activity, logs, and other data retained by Google for the Account can indicate who has used or controlled the Account.

72. Based on my training and experience, I know that criminals utilize internet browsers, like Chrome, to conduct research and to find out what information is publicly available. Google maintains information associated with the Account's cookies, which are messages that web servers pass to a user's web browser when the user visits internet sites.

73. Information maintained by the email provider, such as the IP addresses from which users access the email account, the time and date of that access, and location history can show how and when the account was accessed or used. With this information, investigators can understand the chronological and geographic context of the email account access and use, and the geographic location of the account user at a particular time, relating to the crime under investigation. This geographic and

timeline information may tend to either inculcate or exculpate the account owner. Further, because every device has unique hardware and software identifiers, and because every device that connects to the Internet must use an IP address, IP address and device identifier information can help to identify which computers or other devices were used to access the account. Such information also allows investigators to understand the geographic and chronological context of access, use, and events relating to the crime under investigation.

74. Based on my training and experience, I know that criminals may delete information saved to their digital devices, such as computers, to hide their criminal activities. However, that information may be saved by the service provider. For example, I know that Google can store a record of a customer's browser or search history if the user is logged into their Google account. While a customer may clear their local search history, that information may still be stored on Google servers.

### CONCLUSION

75. Based on the forgoing, I request that the Court issue the proposed search warrant.

76. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant. The government will execute this warrant by serving the warrant on Google LLC. Because the warrant will be served on Google LLC, who will then compile the requested records at a time

convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

**REQUEST FOR SEALING**

77. I further request that the Court order that all papers in support of this application, including the affidavit and search warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may give the target(s) an opportunity to flee from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise seriously jeopardize the investigation.



## **ATTACHMENT A**

### **Property to Be Searched**

This warrant applies to information related to the following Google Accounts and associated email addresses that are stored at premises owned, maintained, controlled, or operated by Google LLC, a company headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043.

1. Google Account ID: **413156676575** ([Greengardens211@gmail.com](mailto:Greengardens211@gmail.com))
2. Google Account ID: **898790022528** ([abduabdullahgilani888@gmail.com](mailto:abduabdullahgilani888@gmail.com))
3. Google Account ID: **551919651702** ([bnb5933@gmail.com](mailto:bnb5933@gmail.com))

**ATTACHMENT B**  
**Particular Things to Be Seized**

**I. Information to be disclosed by Google LLC (the "Provider")**

To the extent that the information described in Attachment A is within the possession, custody, or control of the Provider, regardless of whether such information is located within or outside of the United States, and including any information that has been deleted but is still available to the provider or has been preserved pursuant to a request made under 18 U.S.C. § 2703(D), the Provider is required to disclose the following information to the government for each account or identifier listed in Attachment A for the time period **January 1, 2015 to present**:

**Google Account**

- **SUBSCRIBER AND ACCESS RECORDS:** All business records and subscriber information, in any form kept, pertaining to the account, including: full name; physical address; telephone numbers, including SMS recovery and alternate sign-in numbers; alternative and recovery email addresses, including those provided during registration; usernames, screennames and other identifiers; account status; account creation date; account registration IP address; length of service; records of session times and durations, including log-in IP addresses; methods of connecting; log files; subscriber change history; means and source of payment (including any credit or bank account number); and detailed billing records;
- **DEVICES:** All device information associated with the accounts, including but not limited to, manufacture names, model numbers, serial number, media access control (MAC) addresses, international mobile equipment identifier · (IMEI) numbers, FCC ID numbers, Android IDs, and telephone numbers;
- **SERVICES:** All records and other information (including records of non-content user activity for each connection made to or from the Account(s), the date, time, length, and method of connection, data transfer volume, user names, source and destination IP address, name of accessed Google service, and all activity logs) associated with the Accounts, including those related to the use of all Google services, including but not limited to the following Google services: Calendar, Chrome Sync, Contacts, Docs, Drive, Gmail, Hangouts, Keep, Location History, Maps, Photos, Play Store, Search History, Tasks, Voice, and YouTube;
- **FORWARDING OR FETCHING ACCOUNTS:** All forwarding or fetching accounts relating to the accounts;

• **BROWSING, SEARCH, and APPLICATION USE HISTORY:** All Internet search, browsing history, and application usage history, such as Web & App Activity, from **January 1, 2015 to present**, including: search terms; browsing history, including application usage; bookmarks; passwords; autofill information; alerts, subscriptions, and other automated searches, including associated notifications and creation dates; all text typed into the Google Chrome address bar or Google search bar, including URLs and IP addresses; all URLs or IP addresses clicked on; user settings; and all associated logs and change history;

**PAYMENT:** All payment and transaction data associated with the account, such as Google Pay and Google Wallet, including: records of purchases, money transfers, and all other transactions; stored credit; gift and loyalty cards; associated payment cards, including any credit card or bank account number, PIN, associated bank, and other numbers; and all associated access and transaction logs, including IP address, time stamp, and change history;

**LINKED ACCOUNTS:** For all Google Accounts that are linked to any of the accounts listed in Attachment A by cookies; recovery, secondary, forwarding; or alternate email address; Android ID; IMEI; or telephone number, including SMS recovery number or sign-in account number, provide:

- a. Names (including subscriber names, user names, and screen names);
- b. Addresses (including mailing addresses, service addresses, residential addresses, business addresses, and e-mail addresses);
- c. Local and long distance telephone connection records (including records of text messages sent and received) from **January 1, 2015 to present**, if applicable;
- d. Records of session times and durations from **January 1, 2015 to present**, if applicable;
- e. Length of service (including start date) and types of service utilized;
- f. Telephone or instrument numbers (including model type/numbers, phone numbers, IMSIs, IMEIs, MEIDs, UDIDs, MAC addresses, and advertising IDs);

- g. Other subscriber numbers or identities, including any temporarily assigned network addresses (including the registration and session Internet Protocol ("IP") addresses with associated port numbers); and
- h. Means and source of payment for such service (including any credit card or bank account number).

- **LOCATION HISTORY:** All records indicating the location at which the account was active, such as Location History and Web & App Activity, including: GPS data; cell site/cell tower information; IP addresses; information associated with each location record, including the source of the data, date and time, latitude and longitude, estimated accuracy, device and platform, and inferences drawn from sensor data (such as whether a user was at rest, walking, biking, or in a car); and associated logs and user settings, including Timeline access logs and change history;

## **Gmail**

- **GMAIL:** The contents of all emails associated with the account; including, but not limited to: stored or preserved copies of emails sent to and from the account, draft emails, and deleted emails; attachments; the source and destination addresses associated with each email; the date and time at which each email was sent; the size and length of each email and true and accurate header information including the actual IP addresses of the sender and recipients of the emails;

- **CONTACTS:** Any records pertaining to the user's contacts, including: address books; contact lists, including autocomplete suggestions; social network links; groups, including Google Groups to which the user belongs or communicates with; user settings; and all associated logs and change history;

- **CALENDAR:** Any records pertaining to the user's calendar, including: Google Calendar entries; Google Tasks; reminders; appointments; invites; and goals; the sender and recipients of any event invitation, reminder, appointment, or task; user settings; and all associated logs and change history;

- **WEB-BASED CHATS:** The contents of all chats associated with the account, including Google Hangouts, Meet, and Chat, in any format (text, audio, or video) including, but not limited to: stored, deleted, and draft chat communications, including attachments and links; the source and destination addresses associated with each communication, including IP addresses; the size and length of each communication; user settings; and all associated logs, including access logs and change history;

## **Google Drive**

- The contents of all records associated with the account in Google Drive (including Docs, Sheets, Forms, and Slides) and Google Keep, including: files, folders, media, notes, lists, and other data uploaded, created, stored, or shared with the account including drafts and deleted records; the creation and change history of each record; accounts with access to or which previously accessed each record; any location, device, other Google service (such as Google = Classroom or Google Group), or third -party application associated with each record; and all associated logs, including access logs and IP addresses, of each record;

### **Google Photos**

- The contents of all media associated with the account in Google Photos or Picasa, including: photos, GIFs, videos, animations, collages, icons, or other data uploaded, created, stored, or shared with the account, including drafts and deleted records; third-party data; the creation and change history of each record; accounts with access to or which previously accessed each record; any location, device, or third-party application data associated with each record; and all associated logs, including access logs and IP addresses, of each record;

### **Google Maps and Trips**

- All maps data associated with the account, including Google Maps and Google Trips, including: all saved, starred, and privately labeled locations; search history; routes begun; routes completed; mode of transit used for directions; information associated with locations and other data associated with My Maps and Location Sharing; accounts and identifiers receiving or sending Location Sharing information to the account; changes and edits to public places; and all associated logs, including IP addresses, location data, and timestamps, and change history;
- Google Play Store

- **MEDIA AND APPLICATIONS:** All activity relating to Google Play, including: downloaded, installed, purchased, used, and deleted applications, movies, music, television shows, books, magazines, games, and other files; details of the associated device and Android ID for each application, medium, or file; user settings; and all associated logs, including IP addresses, location data, timestamps, and change history;

### **Google Voice**

- **GOOGLE VOICE:** All Google Voice records associated with the account, including: associated telephone numbers, including forwarding numbers; connection records; call detail records; SMS and MMS messages, including draft and deleted messages; voicemails, including deleted voicemails; user settings; and all associated logs, including access logs, IP addresses, location data, timestamps, and change history;

- **GOOGLE VOICE SUBSCRIBER RECORDS:** All business and subscriber records associated with the account on Google Voice, including: name; user name; physical address; alternate or recovery emails; telephone numbers, including SMS recovery numbers; linked accounts; account status; account creation date; account registration IP address; length of service; associated devices; associated Android IDs; means and source of payment (including any credit or bank account number); and all associated logs and change history;

## **Messaging Services**

- **MOBILE MESSAGING:** The contents of all messages associated with the account, including Google Duo, Android Messages, and Google Allo, in any format (e.g. SMS, MMS, or RCS) including, but not limited to: stored, deleted, and draft messages, including attachments and links; the source and destination addresses associated with each communication, including IP addresses and telephone numbers; the size and length of each communication; associated telephone numbers, including SMS recovery numbers; usernames and other identifiers; user settings; and all associated logs and change history;

## **YouTube**

- **YOUTUBE CONTENTS:** The contents of all media associated with the account on YouTube, whether active, deleted, or in draft, including: copies of videos and other media only if uploaded to, saved to, shared by or shared with the account; edits, comments, likes, chats, and other interactions, including associated URLs; search history; channels; subscriptions; subscribers, friends, and other contacts; playlists; connected applications; associated URLs for each record; creation and change history; privacy settings for each record; and all associated logs, including IP addresses, locations, timestamps, and device identifiers;

- **YOUTUBE WATCH HISTORY:** A record of the account's watch history, including: accessed URLs and their associated duration, privacy settings, upload timestamps, tags, IP addresses, change history, location information, and uploading account or identifier; the logs for each access by the account, including IP address, location, timestamp, and device identifier; and change history;

- **YOUTUBE SUBSCRIBER RECORDS:** All business and subscriber records associated with the account on YouTube, including birthday; name; username and other identifiers; linked accounts; alternate or recovery emails; telephone numbers, including 8M8 recovery numbers; physical addresses; account status; account creation date; account registration IP address; length of service; means and source of payment

(including any credit or bank account number); associated devices; associated Android IDs; and associated logs and change history;

- languages of input and output; and all associated logs, including access logs, IP addresses, timestamps, location data, and change history;

The Provider is hereby ordered to disclose the above information to the Government within **14** days of the issuance of this warrant.

**I. Information to be seized by the government**

All information described above in Section I that constitutes evidence and/or instrumentalities of violations of 18 U.S.C. §§ 2339A and 2339B involving the subscriber since **January 15, 2015**, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. Records and information of the subscriber's role in providing financial, material, training or personnel support to a designated Foreign Terrorist Organization (FTO).
- b. Records and information regarding the subscriber's ties to individuals arrested in Kosovo for terrorism;
- c. Records and information relating to targets or potential targets of violence, by the subscriber;
- d. The identity of the person(s) who created or used the Google ID;
- e. Evidence indicating how and when the account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and the account subscriber;

f. Any records pertaining to the means and source of payment for services (including any credit card or bank account number or digital money transfer account information);

g. Evidence indicating the subscriber's state of mind as it relates to the crime under investigation, including interests and motivations; and

h. Evidence that may identify any co-conspirators or aiders and abettors, including records that help reveal their whereabouts.

This warrant authorizes a review of electronically stored information, communications, and other records and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the disclosed electronic data to the custody and control of attorneys for the government and their support staff for their independent review.